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AUG 26 2019

7 Attorneys for Defendant
8 Chubb Indemnity Insurance Company

9 **WORKERS' COMPENSATION APPEALS BOARD**
10 **STATE OF CALIFORNIA**

11 JONATHAN SHOCKLEY,

12 Applicant,

13 vs.

14 BIOTELEMETRY, INC. DBA CARDIONET,
15 LLC; CHUBB INDEMNITY INSURANCE
16 COMPANY,

17 Defendant.

WCAB No.: ADJ12031731 (OAK)

NOTICE OF TAKING DEPOSITION

THURSDAY, OCTOBER 10, 2019
AT
10:00 A.M.

18 **TO ALL PARTIES HEREIN AND TO THEIR ATTORNEYS OF RECORD, IF ANY:**
19 PLEASE TAKE NOTICE that on **THURSDAY, OCTOBER 10, 2019 AT 10:00 A.M.** at the law
20 offices of **Farber & Co.** located at 333 Hegenberger Road, Suite 504 , Oakland, CA 94621, the
21 employer and/or its adjusting agency, through its representative, will take the oral deposition of
22 applicant, **JONATHAN SHOCKLEY**, in the above-captioned matter before a certified shorthand
23 reporter. The deposition will continue from day to day, excepting Saturdays, Sundays and holidays
24 until completed.

25 The applicant may be entitled to a foreign language interpreter for this deposition. Should this
26 assistance be necessary, and an interpreter is not listed on the service list, please contact this office
27 immediately.

28 **WHEN AN INTERPRETER IS REQUIRED FOR SAID DEPOSITION, DEFENDANT**
WILL PROVIDE A CERTIFIED INTERPRETER FOR BOTH THE DEPOSITION AND PRE-
DEPOSITION PREPARATION. DEFENDANT WILL NOT PAY A SECOND INTERPRETER

1 TO DO THE PREPARATION FOR THE DEPOSITION. FURTHER, IF APPLICANT
2 CANCELS THE DEPOSITION FOR ANY REASON, OR FAILS TO APPEAR WITHOUT
3 GOOD CAUSE, DEFENDANT WILL REQUEST THE WCAB ORDER APPLICANT OR HIS
4 ATTORNEY TO PAY ANY CHARGES DEFENDANT INCURS FOR LATE
5 CANCELLATION OF INTERPRETER. ANY CANCELLATIONS MUST BE MADE 48
6 HOURS IN ADVANCE OF THE DEPOSITION TO AVOID LATE CHARGES FOR THE
7 INTERPRETER.

8 It is unknown by the noticing party whether a contract exists between our client and the
9 court reporting agency, however, the undersigned counsel has been instructed to use said
10 agency.

11 This deposition is pursuant to Labor Code Section 5710 and Code of Civil Procedure 2025.

12 All parties and/or counsel for the parties in this action have been served with a copy of this
13 notice and are listed on the attached Proof of Service.

14 Dated: August 22, 2019

15 Respectfully submitted,
16 COLANTONI, COLLINS, MARREN, PHILLIPS & TULK, LLP

17 BY: 

18 James J. Goines
19 Attorney for Defendant
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COLANTONI COLLINS FOLSOM
LISA HARD
855-396-1220 402
MAIL-SAC@CCMPT.COM

PROOF OF SERVICE BY MAIL

JONATHAN SHOCKLEY v. BIOTELEMETRY, INC. dba CARIONET, LLC
(CHUBB INDEMNITY INSURANCE COMPANY)
WCAB NO: ADJ12031731 (OAK)
CLAIM NO: 040519008736

I, Melissa Hard, declare as follows:

I am over the age of 18 years, and not party to this action. My business address is 340 Palladio Parkway, Suite 533, Folsom, CA 95630, which is located in the county where the mailing described took place.

I am readily familiar with the business practice at my place of business for collection and processing of correspondence for mailing with the United States Postal Service. Correspondence so collected and processed is deposited with the United States Postal Service that same day in the ordinary course of business.

On **August 22, 2019**, at my place of business at Folsom, California, a copy of the following documents:

- **NOTICE OF TAKING DEPOSITION DATED 08/22/2019**

were placed for deposit in the United States Postal Service in a sealed envelope, with postage fully prepaid, addressed to:

ORIGINAL TO:

Jonathan Shockley
1000 Sutter St, #123
San Francisco, CA 94109

COPIES TO:

Mario Castro
Chubb Group of Insurance Companies
Western Claim Service Center
PO Box 42065
Phoenix, AZ 85080-2065

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1 Farber & Co.
2 333 Hegenberger Road, Suite 504
3 Oakland, CA 94621

4 Veritex Legal Solutions (via website)
5 (*Court Reporter*)

6 and that envelope was placed for collection and mailing on that date following ordinary business
7 practices.

8 I declare under penalty of perjury under the laws of the State of California that the foregoing
9 is true and correct. Executed on **August 22, 2019**.

10 By: M Hard
11 Melissa Hard
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